



Marjorie Hauf, Esq.
Nevada Bar No.: 8111
Matthew G. Pfau, Esq.
Nevada Bar No.: 11439
Cara Xidis, Esq.
Nevada Bar No.: 11743
H&P LAW
710 South 9th Street
Las Vegas, NV 89101
702 598 4529 TEL
702 598 3626 FAX
e-file@courtroomproven.com
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

Courtney Cloud,

Plaintiff,

vs.

Allstate Indemnity Company; Does 1
through 10, inclusive, and Roe
Corporations 1 through 10, inclusive,

Defendants.

Case No.: 2:23-cv-00468-JCM-DJA

**Stipulation and ~~Proposed~~ Order to
Extend Deadlines
(5th Request)**

IT IS HEREBY STIPULATED AND AGREED by and between the parties hereto,
by and through their respective counsel of record, that the discovery deadlines in
this case be extended as follows:

A. COMPLETED DISCOVERY

1. Plaintiff has served her initial disclosures of witnesses and documents, and supplements thereto;
2. Defendant has served its initial disclosures of witnesses and documents, and supplements thereto;
3. Plaintiff has propounded and answered written discovery requests;



4. Defendant has propounded and answered written discovery requests;
5. Plaintiff and Defendant have disclosed their initial and rebuttal expert witnesses and supplements thereto;
6. Plaintiff has taken the depositions of Allstate employees Sean Owens, Christine Fox, Jonathan Bourne, Rodney Farney and Steven Peterson;
7. Defendant has taken the deposition of Plaintiff;
8. Defendant has taken the deposition of Plaintiff's experts Paul Thomas and Stephen Strzelec.

B. OUTSTANDING DISCOVERY

1. Deposition of Monique Cox (currently set for November 4, 2024);
2. Deposition of Sarah Hutchison (currently set for November 4, 2024);
3. Deposition of the Allstate Indemnity Company's FRCP 30(b)(6) witness;
4. Deposition of Defendant's expert witness Steven Plitt.

C. GOOD CAUSE EXISTS FOR AN EXTENSION

Counsel for the parties have been diligent in conducting discovery but need additional time to conduct the remaining depositions. The depositions of Allstate Indemnity Company's FRCP 30(b)(6) witness and Allstate's expert, Steven Plitt, were noticed to take place on October 28 and 29, 2024. Had everything gone according to plan, the outstanding discovery would have been completed prior to the current close of discovery. Unfortunately however, Plaintiff's counsel fell ill and was unable to take the depositions, as noticed. She immediately contacted defense counsel, who advised he was amenable to rescheduling the depositions, but that Mr. Plitt would not be available until January. Counsel for the parties are currently working together to reset the remaining depositions to take place no later than January 31, 2025.

This case is also scheduled for mediation on December 18, 2024. If successful,



this will render the remaining discovery unnecessary. If unsuccessful, the conservative extension will not unreasonably delay the proceedings.

Based on the foregoing, the parties have established good cause to extend the close of discovery one final time. Plaintiff has also established excusable neglect for not requesting an extension at least 21 days prior to the close of discovery, as her illness was unforeseeable and occurred after the deadline to timely submit a request for extension had passed.

D. PROPOSED EXTENDED DEADLINES

The parties have agreed to extend the discovery deadlines in this case, as follows:

	CURRENT DEADLINE	PROPOSED DEADLINE
Motions to amend or add parties	Closed	Closed
Initial expert disclosures	Closed	Closed
Rebuttal expert disclosures	Closed	Closed
Close of Discovery	November 6, 2024	January 31, 2025
Dispositive motions	December 6, 2024	March 3, 2025
Pretrial Order	January 6, 2025	April 2, 2025, or, if dispositive motions are filed, 30 days after the entry of order on the dispositive motions.

Dated this 31st day of October, 2024.

H&P LAW

/s/ Marjorie Hauf

Marjorie Hauf, Esq.
Nevada Bar No. 8111
Cara Xidis, Esq.
Nevada Bar No. 11743
Attorneys for Plaintiff

Dated this 31st day of October, 2024.

KEATING LAW GROUP

/s/ John T. Keating

John T. Keating, Esq.
Nevada Bar No. 6373
Attorney for Defendant



ORDER

IT IS SO ORDERED that the parties' Stipulation to extend deadlines (ECF No. 23) is GRANTED.

DATED: 11/1/2024

A handwritten signature in blue ink, appearing to read 'D. Albregts', is written over a horizontal line.

DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE